

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 1:21-cr-10256-RWZ
)	
KINGSLEY R. CHIN,)	
ADITYA HUMAD, and)	
SPINEFRONTIER, INC.,)	
)	
Defendants)	

GOVERNMENT'S INTERIM STATUS REPORT

Pursuant to Local Rule 116.5(b), the United States hereby files the following interim status report prepared in connection with the status conference scheduled for September 13, 2022.

The government conferred with counsel for the defendants on this report, and counsel to Chin and SpineFrontier had no objection. Counsel to Humad indicated that he would soon be filing a notice of withdrawal, and therefore deferred to successor counsel on the issues raised herein. As of this filing, the government is not aware of who Humad's successor counsel may be.

1) Automatic Discovery

The government provided automatic discovery to the defendants on October 29, 2021, and has made supplemental discovery productions on December 10, 2021, January 10, 2022, February 17, 2022, and June 15, 2022. There are no pending discovery requests.

2) Additional Discovery

At this time, the government does not anticipate producing supplemental discovery. The government will provide additional discovery to the defendants if it receives or identifies additional discoverable documents.

3) Timing of Additional Discovery Requests

The defendants have not submitted any discovery requests to the government to date.

The government requests that the defendants submit any discovery requests no later than October 14, 2022, and file any discovery motions no later than November 28, 2022, so that the Court may hear argument on any discovery motions at the interim status conference proposed in paragraph 10 below.

4) Protective Orders

The Court has entered a protective order in this matter. *See* Dkt. No. 37.

5) Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b).

6) Expert Discovery

The parties agree that deadlines for expert disclosures should be established at a later date.

7) Defenses of Insanity, Public Authority, or Alibi

None of the defendants presently intends to assert a defense of insanity, public authority, or alibi.

8) Speedy Trial Act

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through September 13, 2022. The parties request that the time be excluded from September 13, 2022 until the next conference or hearing in this matter.

9) Status of Plea Discussions and Likelihood of Trial

None of the defendants has expressed an intention to plead guilty. The parties estimate that a trial in this matter would last three to five weeks.

10) Next Status Conference

The government requests that the Court schedule a status conference for December 12, 2022, which is 90 days from the date of the September 13, 2022 status conference.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

RACHAEL S. ROLLINS
United States Attorney

/s/ David J. Derusha
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Dated: September 7, 2022

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ David J. Derusha

David J. Derusha

Assistant United States Attorney

Dated: September 7, 2022